## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

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Plaintiff,

CIVIL ACTION NO. 4:20-cv-653-SDJ

v.

GRANDE COMMUNICATIONS NETWORKS, LLC,

Defendant.

## JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff CDN Innovations, LLC ("Plaintiff") and Defendant Grande Communications Networks, LLC ("Defendant") have reached an agreement in principle that resolves all matters in controversy between them in the above-entitled and numbered action. The parties expect to jointly file a dismissal with prejudice of all claims between them within 30 days. Accordingly, the parties respectfully request the Court stay all pending deadlines between them for 30 days, up to and including November 8, 2021. Plaintiff and Defendant request this stay, not for purposes of any delay, but so that they may finalize and file dismissal papers without incurring additional expenses.

Dated: October 8, 2021 Respectfully submitted,

By: /s/ James M. Lennon

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Attorneys for Defendant Grande Communications Networks, LLC

## **CERTIFICATE OF SERVICE**

The undersigned certifies that on October 8, 2021 a true and correct copy of the foregoing document was served on all attorneys of record who have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ James M. Lennon
James M. Lennon